

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
PO Box 4570  
Wilmington, DE 19807

September 20, 2023

**BY CM/ECF**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

**RE:** *Crystallex International Corporation v. Bolivarian Republic of Venezuela*,  
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark:

Pursuant to the Court's request at the status hearing on September 12, 2023, I respectfully submit this letter to provide my position on Red Tree Investment's ("Red Tree") request to toll the 60-day deadline for levying a writ of attachment for all Additional Judgment Creditors under 10 *Del. C.* § 5081 (the "Proposal").

I have discussed the Proposal with my advisors. My advisors, in turn, have conferred with counsel to Red Tree to better understand and form an opinion on the Proposal, and I have no objection to the Proposal.

I note that the Court has previously ordered similar relief involving the same provision. In January 2021, the Court entered an order stating that the priority period of three years, also established in 10 *Del. C.* § 5081, had been tolled and would remain so until further order of the Court. *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, 2021 WL 129803, at \*15 (D. Del. Jan. 14, 2021).

Sincerely,

/s/ Robert B. Pincus

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

cc: All Counsel of Record (via CM/ECF and E-Mail)